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November 22, 1996

Mr. William F. Caton  
Acting Secretary  
Federal Communications Commission  
1919 M Street, N.W.  
Room 222  
Washington, DC 20554

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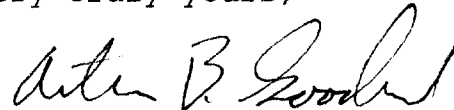
Re: MM Docket No. 87-268

Dear Mr. Caton:

Transmitted herewith, on behalf of Renaissance Communications Corp., are an original and nine copies of its "Separate Comments of Renaissance Communications Corp." filed in response to the Commission's Sixth Notice of Rulemaking in the above-referenced matter.

In the event there are any questions concerning this matter, please contact the undersigned.

Very truly yours,



Arthur B. Goodkind

Enclosure

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Before the  
Federal Communications Commission  
Washington, D.C. 20554

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COMMUNICATIONS SECTION  
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In the Matter of )  
 )  
Advanced Television Systems )  
and Their Impact Upon the ) MM Docket No. 87-268  
Existing Television Broadcast )  
Service )

TO: The Commission

SEPARATE COMMENTS OF RENAISSANCE COMMUNICATIONS CORP.

Renaissance Communications Corp. ("Renaissance"), by its attorneys, hereby files its separate comments in the above-captioned proceeding. Renaissance is the licensee of six television stations located in Sacramento, California, Dallas, Texas, Indianapolis, Indiana, Hartford, Connecticut, Miami, Florida and York, Pennsylvania.

Renaissance is one of the many signatories to the "Broadcasters' Comments on the Sixth Notice of Proposed Rule Making," which are being jointly filed today in this proceeding by the Broadcasters Caucus and many other television broadcast licensees. Renaissance concurs fully with the general principles advocated in that filing, and specifically with the concepts (a)

of a transitional table of DTV allotments paired with existing station channel assignments and (b) of the full use of all presently utilized VHF and UHF channels in making DTV allotments for the transitional period.

Renaissance does not, however, concur with the specific channel allotments recommended for four of its stations in the "Modified DTV Table" submitted with the "Broadcasters" comments. In three of those cases, the channel assignments in the Modified Table are far less satisfactory than those recommended in the proposed table included with the Commission's Sixth Further Notice of Proposed Rule Making, and in two of the cases would result in the Renaissance stations involved having both their existing NTSC channels and their proposed DTV allotments outside the "core" channels proposed to be retained for broadcast use after the transition. Those proposed allotments are Channel 63 for WTIC-TV in Hartford, which presently operates on Channel 61; Channel 66 for WXIN in Indianapolis, which presently operates on Channel 59; and Channel 64 for WPMT in York, which presently operates on Channel 43. Renaissance also believes that it may be possible to allot a lower channel to Station KTXL in

Sacramento than the Channel 53 tentatively designated in both the FCC's table and in the Broadcasters' Modified Table.

Accordingly, Renaissance does not support inclusion of these specific channel allotments in the final DTV table. Renaissance intends to undertake appropriate engineering studies to identify other channels in each market that would permit the Renaissance stations to serve their communities on a more efficient basis and to continue to provide a wide area to Fox Television Network to viewers who now depend on the stations for such service. Renaissance will pursue coordination of any substitute channels it identifies through the Broadcasters' Caucus. Upon completion of that process, Renaissance intends to file requests for

modification of the DTV table through appropriate rulemaking proceedings.

Respectfully submitted,

RENAISSANCE COMMUNICATIONS CORP.

By: Arthur B. Goodkind  
Arthur B. Goodkind

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